

From: [Moore, Gary](#)
To: t.a.walzer@westonsolutions.com
Subject: Re: CES Tables
Date: Wednesday, December 03, 2014 12:13:22 AM

It needs to be clear which Summas were taken in the residential area and which on the industrial area. I think I am ok with everything else. I just need to get the entire package again to review in total.

Also, how much time do we have left on the TDD.

Thanks

Gary Moore

Federal On-Scene Coordinator

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moore.gary@epa.gov

From: Walzer, Thomas
Sent: Tuesday, December 2, 2014 5:09 PM
To: Moore, Gary
Cc: Bercher, Corey; Tighe, C. Daniel; Crow, David
Subject: RE: CES Tables

Gary;

As you requested I deleted the comparison values from the waste table to be used in the report (see PDF file). For your use I attached the Excel version of the Waste Table with the comparison values in place.



Thomas Walzer

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http://www.epa.gov/osw/hazard/testmethods/faq/faq_tclp.htm

Total Constituent Analysis Instead of TCLP Analysis

Question: Is it acceptable to perform a total constituent analysis instead of a TCLP analysis and then divide the total concentration by 20 to determine if a waste is non-hazardous, as is implied in Section 1.2 of Method 1311, TCLP?

From: Walzer, Thomas

Sent: Tuesday, December 02, 2014 4:17 PM

To: 'Moore, Gary'

Cc: Bercher, Corey; Tighe, C. Daniel; Crow, David

Subject: RE: CES Tables

I only identified changes in the waste table and made those (See attached).

One question does the TCLP X20 rule apply to liquid water matrix material? Based on the information I found below, I thought that only applied to solid matrix materials.



9855439

Answer: Section 1.2 of the TCLP *does* allow for a total constituent analysis in lieu of the TCLP extraction. If a waste is 100% solid, as defined by the TCLP method, then the results of the total constituent analysis may be divided by twenty to convert the total results into the maximum leachable concentration. This factor is derived from the 20:1 liquid-to-solid ratio employed in the TCLP. If a waste has filterable liquid, then the concentration of the analyte in each phase (liquid and solid) must be determined. The following equation may be used to calculate this value:

$$\frac{[A \times B] + [C \times D]}{B + [20 (L/kg) \times D]} = E$$



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From: Moore, Gary [<mailto:Moore.Gary@epa.gov>]

Sent: Friday, November 28, 2014 11:03 AM

To: Walzer, Thomas

Subject: RE: CES Tables

Tom:

Please see the table as I made some additional changes.

Thanks

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From: Walzer, Thomas

[<mailto:T.A.Walzer@WestonSolutions.com>]

Sent: Wednesday, November 26, 2014 8:20 AM

To: Moore, Gary

Cc: Thibodeaux, Denece; Crow, David

Subject: CES Tables



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